

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

JENNIFER OSSOLA, JOETTA
CALLENTINE, and SCOTT DOLEMBA, on
behalf of themselves and all others similarly
situated,

Plaintiffs

v.

AMERICAN EXPRESS COMPANY,
AMERICA EXPRESS CENTURION BANK,
and WEST ASSET MANAGEMENT, INC.,

Defendants.

Case No. 1:13-cv-04836

Judge John Z. Lee
Magistrate Judge Jeffrey Cole

**Plaintiffs and American Express’
Joint Motion to Extend Date for Preliminary Approval Motion**

Plaintiffs Jennifer Ossola and Joetta Callentine and the American Express defendants respectfully request that the Court extend the date within which they may file their motions for preliminary approval of class settlement, until June 23, 2016. Movants also request that the Court reset the existing presentment/status date to June 29, 2016.

In support of this motion, movants respectfully state:

1. This is a Telephone Consumer Protection Act case, which challenges two types of calls: (a) debt collection calls made by defendant West Asset Management, Inc., and (b) telemarketing calls made by former defendant Alorica, Inc.

2. All parties mediated these cases on April 14, 2016, with the Honorable Morton J. Denlow, which resulted in two class settlements in principle, one for the debt collection class and a second for the telemarketing class.

3. At the status conference on April 19, 2016, this Court set a deadline of May 31, 2016, as the deadline for filing preliminary approval for both settlements. Docket Entry 344. Plaintiffs and American Express have been working diligently to complete the two settlements. For example, plaintiffs took the Fed.R.Civ.P. 20(b)(6) deposition of Alorica in Plantation, Florida for settlement class confirmation purposes, on May 26, 2016. Plaintiffs have also been working hard to obtain similar confirmatory information from West.

4. However, despite the parties' efforts, they have not yet completed or executed the formal settlement documents necessary to effectuate their agreement. The parties believe that they will be able to meet their proposed June 24, 2016, deadline, but regret to inform the Court that they cannot meet the current May 31, 2016 deadline. Movants also respectfully request that the existing June 8, 2016, date be continued to June 29, 2016.

5. Movants file this motion in good faith, and not for purposes of delay or for any improper purpose.

WHEREFORE, Jennifer Ossola and Joetta Callentine and the American Express defendants respectfully request that the Court extend the date within which they may file their motions for preliminary approval of class settlement, until June 23, 2016, and continue the existing status/presentment date to June 29, 2016.

Respectfully Submitted,

Dated: May 27, 2016

By: /s/Alexander H. Burke

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